

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES

SECRET

The People of the State of California,

Plaintiff,

v.

CASE NO. **BA396065**

INDICTMENT

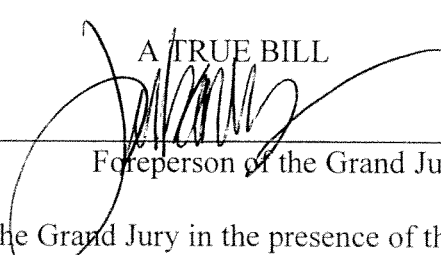
1. TODD DESTEFANO
2. PASQUALE ROTELLA
3. REZA GERAMI
4. PATRICK LYNCH
5. ANTONIO ESTRADA
6. LEOPOLD CAUDILLO

**COUNT 1**

The said **TODD DESTEFANO, PASQUALE ROTELLA, REZA GERAMI and PATRICK LYNCH** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **CONSPIRACY TO COMMIT EMBEZZLEMENT**, in violation of **Penal Code Section 182(a)(1)**, a Felony, committed prior to the finding of this Indictment, and as follows:

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A TRUE BILL

  
Foreperson of the Grand Jury

Presented by the Foreperson of the Grand Jury in the presence of the Grand Jury, in open Superior Court of the State of California, within and for the County of Los Angeles, and filed as a record in said Court this 20<sup>th</sup> day of March, 2012

JOHN A. CLARKE, Executive Officer/Clerk

By \_\_\_\_\_ Deputy

STEVE COOLEY, District Attorney

By  Deputy

On and between January 1, 2006 and February 1, 2012, in the County of Los Angeles, the said **TODD DESTEFANO, PASQUALE ROTELLA, REZA GERAMI and PATRICK LYNCH**, did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of Grand Theft by Embezzlement, in violation of Section 487 of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendants committed the following overt act and acts at and in the County of Los Angeles:

#### OVERT ACT

1. On or about June 3, 2008, DESTEFANO drafted a document called "OPERATING AND PARTNERSHIP AGREEMENT" that provided for him to receive 10% of ticket sales in exchange for providing ROTELLA and GERAMI the "use" of the Coliseum and to keep "building related expenses tight."
2. On and between August 23, 2008, and September 29, 2010, ROTELLA caused one million one hundred seventy-five thousand dollars (\$1,175,000) in checks and wire transfers to be issued to DESTEFANO from the company "Insomniac."
3. On and between January 29, 2009, and March 30, 2010, GERAMI caused seven hundred sixteen thousand six hundred eighty dollars (\$716,680) in checks and electronic deposits to be issued to DESTEFANO from the company "Go Ventures."
4. On or about January 14, 2010, DESTEFANO and LYNCH caused a Coliseum contract to limit rent for an upcoming Go Ventures event to \$25,000.
5. On or about March 30, 2010, GERAMI wrote a check to DESTEFANO in the amount of \$20,970.76 and wrote on the check, "Venue/Rent/MM09 Final."
6. On or about March 30, 2010, GERAMI wrote a check to DESTEFANO in the amount of \$3,000 and wrote on the check "MM10/In Ref. to check 5819 Venue Rent."
7. On or about March 30, 2010, GERAMI wrote a check to DESTEFANO in the amount of \$31,200 and wrote on the check "Venue Rent/TAO 10."
8. On or about April 8, 2010, DESTEFANO deposited a check from GERAMI in the amount of \$20,970.76 with the notation "Venue/Rent/MM09 Final."
9. On or about April 16, 2010, DESTEFANO deposited a check from GERAMI in the amount of \$3000 with the notation "MM10/In Ref. to check 5819 Venue Rent."
10. On or about April 16, 2010, DESTEFANO deposited a check from GERAMI in the amount of \$31,200 with the notation "Venue Rent/TAO 10."
11. On or about April 21, 2010, ROTELLA wrote a check to DESTEFANO in the amount of \$50,000 and with the notation, "EDC 09 LA – Venue Use Fee / Balance"
12. On or about April 23, 2010, DESTEFANO deposited a check from ROTELLA in the amount of \$50,000 with the notation "Venue Rent/ TAO 10."
13. On or about July 9, 2010, DESTEFANO forwarded a Los Angeles City Council campaign contribution form for Coliseum Commissioner Bernard Parks Jr. to ROTELLA and GERAMI, requesting that they make maximum contributions and provide him \$10,000 for a fireworks show.
14. On or about July 16, 2010, in an email with the subject heading "confidential" and with an instruction, "Make sure you do not copy anyone on this," DESTEFANO provided a copy of the work product of Coliseum attorneys to ROTELLA prior to the report's release.

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## COUNT 2

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **TODD DESTEFANO and PASQUALE ROTELLA** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER OR AGENT**, in violation of **Penal Code Section 504**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about September 3, 2008, in the County of Los Angeles, the said **TODD DESTEFANO and PASQUALE ROTELLA**, who while **TODD DESTEFANO** was an employee of the Los Angeles Memorial Coliseum, did unlawfully, and fraudulently appropriate to a use and purpose not in the due and lawful execution of his trust, property which he has in his possession and under his control by virtue of his trust and did unlawfully secrete said property with a fraudulent intent to appropriate it to such a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Four Hundred Dollars (\$400).

It is further alleged that the said embezzlement was of the public funds of the State of California, County of Los Angeles, and City of Los Angeles through a Joint Powers Agreement creating the Los Angeles Memorial Coliseum Commission within the meaning of Penal Code Section 514.

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## COUNT 3

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **TODD DESTEFANO and REZA GERAMI** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER OR AGENT**, in violation of **Penal Code Section 504**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about January 30, 2009, in the County of Los Angeles, the said **TODD DESTEFANO and REZA GERAMI**, who while **TODD DESTEFANO** was an employee of the Los Angeles Memorial Coliseum, did unlawfully, and fraudulently appropriate to a use and purpose not in the due and lawful execution of his trust, property which he has in his possession and under his control by virtue of his trust and did unlawfully secrete said property with a fraudulent intent to appropriate it to such a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Four Hundred Dollars (\$400).

It is further alleged that the said embezzlement was of the public funds of the State of California, County of Los Angeles, and City of Los Angeles through a Joint Powers Agreement creating the Los Angeles Memorial Coliseum Commission within the meaning of Penal Code Section 514.

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#### COUNT 4

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TODD DESTEFANO and REZA GERAMI** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER OR AGENT**, in violation of **Penal Code Section 504**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about July 9, 2009, in the County of Los Angeles, the said **TODD DESTEFANO and REZA GERAMI**, who while **TODD DESTEFANO** was an employee of the Los Angeles Memorial Coliseum, did unlawfully, and fraudulently appropriate to a use and purpose not in the due and lawful execution of his trust, property which he has in his possession and under his control by virtue of his trust and did unlawfully secrete said property with a fraudulent intent to appropriate it to such a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Four Hundred Dollars (\$400).

It is further alleged that the said embezzlement was of the public funds of the State of California, County of Los Angeles, and City of Los Angeles through a Joint Powers Agreement creating the Los Angeles Memorial Coliseum Commission within the meaning of Penal Code Section 514.

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#### COUNT 5

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TODD DESTEFANO and PASQUALE ROTELLA** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER OR AGENT**, in violation of **Penal Code Section 504**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about September 2, 2009, in the County of Los Angeles, the said **TODD DESTEFANO and PASQUALE ROTELLA**, who while **TODD DESTEFANO** was an employee of the Los Angeles Memorial Coliseum, did unlawfully, and fraudulently appropriate to a use and purpose not in the due and lawful execution of his trust, property which he has in his possession and under his control by virtue of his trust and did unlawfully secrete said property with a fraudulent intent to appropriate it to such a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Four Hundred Dollars (\$400).

It is further alleged that the said embezzlement was of the public funds of the State of California, County of Los Angeles, and City of Los Angeles through a Joint Powers Agreement creating the Los Angeles Memorial Coliseum Commission within the meaning of Penal Code Section 514.

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## COUNT 6

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TODD DESTEFANO and REZA GERAMI** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER OR AGENT**, in violation of **Penal Code Section 504**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about October 15, 2009, in the County of Los Angeles, the said **TODD DESTEFANO and REZA GERAMI**, who while **TODD DESTEFANO** was an employee of the Los Angeles Memorial Coliseum, did unlawfully, and fraudulently appropriate to a use and purpose not in the due and lawful execution of his trust, property which he has in his possession and under his control by virtue of his trust and did unlawfully secrete said property with a fraudulent intent to appropriate it to such a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Four Hundred Dollars (\$400).

It is further alleged that the said embezzlement was of the public funds of the State of California, County of Los Angeles, and City of Los Angeles through a Joint Powers Agreement creating the Los Angeles Memorial Coliseum Commission within the meaning of Penal Code Section 514.

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## COUNT 7

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TODD DESTEFANO and REZA GERAMI** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER OR AGENT**, in violation of **Penal Code Section 504**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about November 20, 2009, in the County of Los Angeles, the said **TODD DESTEFANO and REZA GERAMI**, who while **TODD DESTEFANO** was an employee of the Los Angeles Memorial Coliseum, did unlawfully, and fraudulently appropriate to a use and purpose not in the due and lawful execution of his trust, property which he has in his possession and under his control by virtue of his trust and did unlawfully secrete said property with a fraudulent intent to appropriate it to such a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Four Hundred Dollars (\$400).

It is further alleged that the said embezzlement was of the public funds of the State of California, County of Los Angeles, and City of Los Angeles through a Joint Powers Agreement creating the Los Angeles Memorial Coliseum Commission within the meaning of Penal Code Section 514.

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## COUNT 8

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TODD DESTEFANO, REZA GERAMI and PATRICK LYNCH** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER OR AGENT**, in violation of **Penal Code Section 504**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about March 24, 2010, in the County of Los Angeles, the said **TODD DESTEFANO, REZA GERAMI and PATRICK LYNCH**, who while **TODD DESTEFANO** was an employee of the Los Angeles Memorial Coliseum, did unlawfully, and fraudulently appropriate to a use and purpose not in the due and lawful execution of his trust, property which he has in his possession and under his control by virtue of his trust and did unlawfully secrete said property with a fraudulent intent to appropriate it to such a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Nine Hundred Fifty Dollars (\$950).

It is further alleged that the said embezzlement was of the public funds of the State of California, County of Los Angeles, and City of Los Angeles through a Joint Powers Agreement creating the Los Angeles Memorial Coliseum Commission within the meaning of Penal Code Section 514.

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## COUNT 9

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TODD DESTEFANO, REZA GERAMI and PATRICK LYNCH** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER OR AGENT**, in violation of **Penal Code Section 504**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about April 8, 2010, in the County of Los Angeles, the said **TODD DESTEFANO, REZA GERAMI and PATRICK LYNCH**, who while **TODD DESTEFANO** was an employee of the Los Angeles Memorial Coliseum, did unlawfully, and fraudulently appropriate to a use and purpose not in the due and lawful execution of his trust, property which he has in his possession and under his control by virtue of his trust and did unlawfully secrete said property with a fraudulent intent to appropriate it to such a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Nine Hundred Fifty Dollars (\$950).

It is further alleged that the said embezzlement was of the public funds of the State of California, County of Los Angeles, and City of Los Angeles through a Joint Powers Agreement creating the Los Angeles Memorial Coliseum Commission within the meaning of Penal Code Section 514.

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## COUNT 10

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **TODD DESTEFANO, REZA GERAMI and PATRICK LYNCH** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER OR AGENT**, in violation of **Penal Code Section 504**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about April 16, 2010, in the County of Los Angeles, the said **TODD DESTEFANO, REZA GERAMI and PATRICK LYNCH**, who while **TODD DESTEFANO** was an employee of the Los Angeles Memorial Coliseum, did unlawfully, and fraudulently appropriate to a use and purpose not in the due and lawful execution of his trust, property which he has in his possession and under his control by virtue of his trust and did unlawfully secrete said property with a fraudulent intent to appropriate it to such a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Nine Hundred Fifty Dollars (\$950).

It is further alleged that the said embezzlement was of the public funds of the State of California, County of Los Angeles, and City of Los Angeles through a Joint Powers Agreement creating the Los Angeles Memorial Coliseum Commission within the meaning of Penal Code Section 514.

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## COUNT 11

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **TODD DESTEFANO, PASQUALE ROTELLA and PATRICK LYNCH** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER OR AGENT**, in violation of **Penal Code Section 504**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about April 23, 2010, in the County of Los Angeles, the said **TODD DESTEFANO, PASQUALE ROTELLA and PATRICK LYNCH**, who while **TODD DESTEFANO** was an employee of the Los Angeles Memorial Coliseum, did unlawfully, and fraudulently appropriate to a use and purpose not in the due and lawful execution of his trust, property which he has in his possession and under his control by virtue of his trust and did unlawfully secrete said property with a fraudulent intent to appropriate it to such a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Nine Hundred Fifty Dollars (\$950).

It is further alleged that the said embezzlement was of the public funds of the State of California, County of Los Angeles, and City of Los Angeles through a Joint Powers Agreement creating the Los Angeles Memorial Coliseum Commission within the meaning of Penal Code Section 514.

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## COUNT 12

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TODD DESTEFANO, PASQUALE ROTELLA and PATRICK LYNCH** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime **EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER OR AGENT**, in violation of **Penal Code Section 504**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about June 24, 2010, in the County of Los Angeles, the said **TODD DESTEFANO, PASQUALE ROTELLA and PATRICK LYNCH**, who while **TODD DESTEFANO** was an employee of the Los Angeles Memorial Coliseum, did unlawfully, and fraudulently appropriate to a use and purpose not in the due and lawful execution of his trust, property which he has in his possession and under his control by virtue of his trust and did unlawfully secrete said property with a fraudulent intent to appropriate it to such a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Nine Hundred Fifty Dollars (\$950).

It is further alleged that the said embezzlement was of the public funds of the State of California, County of Los Angeles, and City of Los Angeles through a Joint Powers Agreement creating the Los Angeles Memorial Coliseum Commission within the meaning of Penal Code Section 514.

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## COUNT 13

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **PATRICK LYNCH and ANTONIO ESTRADA** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **CONSPIRACY TO COMMIT EMBEZZLEMENT**, in violation of **Penal Code Section 182(a)(1)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between July 2006 and November 23, 2010, in the County of Los Angeles, the said **PATRICK LYNCH and ANTONIO ESTRADA**, did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of Grand Theft by Embezzlement, in violation of Section 487 of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendants committed the following overt act and acts at and in the County of Los Angeles:

### OVERT ACT

1. On or around July 2006, LYNCH or ESTRADA prepared a document entitled "PARTNERSHIP AGREEMENT" regarding ESTRADA's company which provided for "a monthly consulting fee" and eventual partnership for LYNCH.
2. On or around July 2006, LYNCH directed Coliseum Financial Director Ron Lederkremer to increase the hourly rate paid to ESTRADA for services provided to the Coliseum.
3. On and between August 10, 2006, and November 23, 2010 ESTRADA wrote 231 checks from his business to LYNCH totaling three hundred seventy-six thousand five hundred fifty-three dollars and fifty-three cents (\$376,553.53).



4. On and between August 16, 2006, and January 24, 2007, LYNCH deposited checks from ESTRADA marked "EVENTS CONSULTANT" in his personal bank account.
5. On or about February 1, 2007, LYNCH created a bank account listing his address as "16232 SW 44<sup>th</sup> Ln, Miami, Florida" and using a signature stamp as an authorized signature.

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#### COUNT 14

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **PATRICK LYNCH and ANTONIO ESTRADA** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER OR AGENT**, in violation of **Penal Code Section 504**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between August 16, 2006 and November 23, 2010, in the County of Los Angeles, the said **PATRICK LYNCH and ANTONIO ESTRADA**, who while **PATRICK LYNCH** was an employee of the Los Angeles Memorial Coliseum, did unlawfully, and fraudulently appropriate to a use and purpose not in the due and lawful execution of his trust, property which he has in his possession and under his control by virtue of his trust and did unlawfully secrete said property with a fraudulent intent to appropriate it to such a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Four Hundred Dollars (\$400).

It is further alleged that the said embezzlement was of the public funds of the State of California, County of Los Angeles, and City of Los Angeles through a Joint Powers Agreement creating the Los Angeles Memorial Coliseum Commission within the meaning of Penal Code Section 514.

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#### COUNT 15

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **PATRICK LYNCH** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **CONFLICT OF INTEREST**, in violation of **Government Code Section 1097**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between July 1, 2006 and November 23, 2010, in the County of Los Angeles, the said **PATRICK LYNCH**, being an employee of the Los Angeles Memorial Coliseum Commission, willfully and knowingly participated in the making, made, and caused to be made, in his official capacity, a contract in which he had financial interest: agreements with Services For All Events for Labor.

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### COUNT 16

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **REZA GERAMI** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime **BRIBING A PUBLIC EMPLOYEE**, in violation of **Penal Code Section 67.5(b)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about January 20, 2010, in the County of Los Angeles, the said **REZA GERAMI**, did unlawfully and with intent to influence **TODD DESTEFANO** in respect to an act, decision, vote, opinion and proceeding of said **TODD DESTEFANO**, give and offer to give a bribe.

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### COUNT 17

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TODD DESTEFANO** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime **ACCEPTING A BRIBE**, in violation of **Penal Code Section 68**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about January 20, 2010, in the County of Los Angeles, the said **TODD DESTEFANO**, unlawfully and knowingly asked for, received, and agreed to receive of and from **REZA GERAMI**, a bribe, to wit, \$60,000, for the purpose of influencing the action of said defendant and upon and agreement and understanding that the action of said defendant upon a matter then pending before the said defendant in his official capacity, to wit, Employee of The Los Angeles Memorial Coliseum, should be influenced thereby, said defendant being then and there an employee, and appointee of the State of California, the County of Los Angeles, the City of Los Angeles, and the Los Angeles Memorial Coliseum Commission through a Joint Powers Agreement.

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### COUNT 18

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **PASQUALE ROTELLA** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime **BRIBING A PUBLIC EMPLOYEE**, in violation of **Penal Code Section 67.5(b)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about September 29, 2010, in the County of Los Angeles, the said **PASQUALE ROTELLA**, did unlawfully and with intent to influence **TODD DESTEFANO** in respect to an act, decision, vote, opinion and proceeding of said **TODD DESTEFANO**, give and offer to give a bribe.

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## COUNT 19

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TODD DESTEFANO** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime **ACCEPTING A BRIBE**, in violation of **Penal Code Section 68**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about September 29, 2010, in the County of Los Angeles, the said **TODD DESTEFANO**, unlawfully and knowingly asked for, received, and agreed to receive of and from **PASQUALE ROTELLA**, a bribe, to wit, \$300,000, for the purpose of influencing the action of said defendant and upon and agreement and understanding that the action of said defendant upon a matter then pending before the said defendant in his official capacity, to wit, Employee of The Los Angeles Memorial Coliseum, should be influenced thereby, said defendant being then and there an employee, and appointee of the State of California, the County of Los Angeles, the City of Los Angeles, and the Los Angeles Memorial Coliseum Commission through a Joint Powers Agreement.

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## COUNT 20

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TODD DESTEFANO** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER OR AGENT**, in violation of **Penal Code Section 504**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about October 12, 2006, in the County of Los Angeles, the said **TODD DESTEFANO**, who while said defendant was an employee of the Los Angeles Memorial Coliseum, did unlawfully, and fraudulently appropriate to a use and purpose not in the due and lawful execution of his trust, property which he has in his possession and under his control by virtue of his trust and did unlawfully secrete said property with a fraudulent intent to appropriate it to such a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Four Hundred Dollars (\$400), to wit, payment from Dreamworks.

It is further alleged that the said embezzlement was of the public funds of the State of California, County of Los Angeles, and City of Los Angeles through a Joint Powers Agreement creating the Los Angeles Memorial Coliseum Commission within the meaning of Penal Code Section 514.

It is further alleged that the conduct in this case was not discovered at the time by anyone in a supervisory capacity other than those involved in the crime because DESTEFANO contracted directly with Dreamworks to rent property entrusted to him and received checks made to his private company. This fact was not discovered until a grand jury subpoena obtained a copy of the contract in the possession of Paramount Pictures in 2012.

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## COUNT 21

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TODD DESTEFANO** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER OR AGENT**, in violation of **Penal Code Section 504**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about August 27, 2008, in the County of Los Angeles, the said **TODD DESTEFANO**, who while said defendant was an employee of the Los Angeles Memorial Coliseum, did unlawfully, and fraudulently appropriate to a use and purpose not in the due and lawful execution of his trust, property which he has in his possession and under his control by virtue of his trust and did unlawfully secrete said property with a fraudulent intent to appropriate it to such a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Four Hundred Dollars (\$400), to wit, payment from AM GLAD Productions.

It is further alleged that the said embezzlement was of the public funds of the State of California, County of Los Angeles, and City of Los Angeles through a Joint Powers Agreement creating the Los Angeles Memorial Coliseum Commission within the meaning of Penal Code Section 514.

\* \* \* \* \*

## COUNT 22

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TODD DESTEFANO** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER OR AGENT**, in violation of **Penal Code Section 504**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between February 17, 2010 and July 16, 2010, in the County of Los Angeles, the said **TODD DESTEFANO**, who while said defendant was an employee of the Los Angeles Memorial Coliseum, did unlawfully, and fraudulently appropriate to a use and purpose not in the due and lawful execution of his trust, property which he has in his possession and under his control by virtue of his trust and did unlawfully secrete said property with a fraudulent intent to appropriate it to such a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, payments from Southern Wine and Spirits.

It is further alleged that the said embezzlement was of the public funds of the State of California, County of Los Angeles, and City of Los Angeles through a Joint Powers Agreement creating the Los Angeles Memorial Coliseum Commission within the meaning of Penal Code Section 514.

\* \* \* \* \*

### COUNT 23

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TODD DESTEFANO and PATRICK LYNCH** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime **EMBEZZLEMENT BY PUBLIC OR PRIVATE OFFICER OR AGENT**, in violation of **Penal Code Section 504**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about November 18, 2010, in the County of Los Angeles, the said **TODD DESTEFANO and PATRICK LYNCH**, who while **TODD DESTEFANO** was an employee of the Los Angeles Memorial Coliseum, did unlawfully, and fraudulently appropriate to a use and purpose not in the due and lawful execution of his trust, property which he has in his possession and under his control by virtue of his trust and did unlawfully secrete said property with a fraudulent intent to appropriate it to such a use and purpose contrary to Penal Code section 487(a), said property being of a value exceeding Nine Hundred Fifty Dollars (\$950), to wit, payment from Coca-Cola.

It is further alleged that the said embezzlement was of the public funds of the State of California, County of Los Angeles, and City of Los Angeles through a Joint Powers Agreement creating the Los Angeles Memorial Coliseum Commission within the meaning of Penal Code Section 514.

\* \* \* \* \*

### COUNT 24

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TODD DESTEFANO** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **CONFLICT OF INTEREST**, in violation of **Government Code Section 1097**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about May 6, 2008, in the County of Los Angeles, the said **TODD DESTEFANO**, being an employee of the Los Angeles Memorial Coliseum Commission, willfully and knowingly participated in the making, made, and caused to be made, in his official capacity, a contract in which he had financial interest: an agreement to rent the Los Angeles Memorial Coliseum for the "Electric Daisy Carnival 2008."

\* \* \* \* \*

### COUNT 25

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TODD DESTEFANO** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **CONFLICT OF INTEREST**, in violation of **Government Code Section 1097**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about June 22, 2009, in the County of Los Angeles, the said **TODD DESTEFANO**, being an employee of the Los Angeles Memorial Coliseum Commission, willfully and knowingly participated in the making, made, and caused to be made, in his official capacity, a contract in which he had financial interest: an agreement to rent the Los Angeles Memorial Coliseum for the "Electric Daisy Carnival 2009."

\* \* \* \* \*

#### **COUNT 26**

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TODD DESTEFANO** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **CONFLICT OF INTEREST**, in violation of **Government Code Section 1097**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about March 1, 2010, in the County of Los Angeles, the said **TODD DESTEFANO**, being an employee of the Los Angeles Memorial Coliseum Commission, willfully and knowingly participated in the making, made, and caused to be made, in his official capacity, a contract in which he had financial interest: an agreement to rent the Los Angeles Memorial Coliseum for the "Monster Massive 2010."

\* \* \* \* \*

#### **COUNT 27**

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TODD DESTEFANO** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **CONFLICT OF INTEREST**, in violation of **Government Code Section 1097**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about June 1, 2010, in the County of Los Angeles, the said **TODD DESTEFANO**, being an employee of the Los Angeles Memorial Coliseum Commission, willfully and knowingly participated in the making, made, and caused to be made, in his official capacity, a contract in which he had financial interest: an agreement to rent the Los Angeles Memorial Coliseum for the "Electric Daisy Carnival 2010."

\* \* \* \* \*

#### **COUNT 28**

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **TODD DESTEFANO** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **CONFLICT OF INTEREST**, in violation of **Government Code Section 1097**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about August 3, 2010, in the County of Los Angeles, the said **TODD DESTEFANO**, being an employee of the Los Angeles Memorial Coliseum Commission, willfully and knowingly participated in the making, made, and caused to be made, in his official capacity, a contract in which he had financial interest: an agreement to rent the Los Angeles Memorial Coliseum for the "Love Festival 2010."

\* \* \* \* \*

## COUNT 29

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **LEOPOLD CAUDILLO** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **CONFLICT OF INTEREST**, in violation of **Government Code Section 1097**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between July 15, 2010 and May 16, 2011, in the County of Los Angeles, the said **LEOPOLD CAUDILLO**, being an employee of the Los Angeles Memorial Coliseum Commission, willfully and knowingly participated in the making, made, and caused to be made, in his official capacity, a contract in which he had financial interest: invoices directing payment to HH Tech.

\* \* \* \* \*

It is further alleged, pursuant to Penal Code 186.11(a), that the offenses set forth in counts 1 through 23 are related felonies, a material element of which is fraud and embezzlement, which involve a pattern of related felony conduct, and the pattern of related felony conduct involves the taking of more than Five Hundred Thousand Dollars (\$500,000).

It is further alleged that in the commission of the above offense(s) the said defendants TODD DESTEFANO, PATRICK LYNCH, PASQUALE ROTELLA and REZA GERAMI, with the intent to do so, took, damaged and destroyed property of a value exceeding \$1,300,000, within the meaning of Penal Code Section 12022.6(a)(3).

It is further alleged that in the commission of the above offense(s) the said defendant Antonio ESTRADA, with the intent to do so, took property of a value exceeding \$200,000, within the meaning of Penal Code Section 12022.6(a)(2).

It is further alleged as to all Counts that the defendants, TODD DESTEFANO and PATRICK LYNCH, are ineligible for probation pursuant to Penal Code section 1203(e)(7).

\* \* \* \* \*

DEFENDANT

BOOKING NO.

BAIL RECOM'D

BAIL

1. TODD DESTEFANO

\_\_\_\_\_

\$2,100,000

\_\_\_\_\_

2. PASQUALE ROTELLA

\_\_\_\_\_

\$1,800,000

\_\_\_\_\_

3. REZA GERAMI

\_\_\_\_\_

\$1,800,000

\_\_\_\_\_

4. PATRICK LYNCH

\_\_\_\_\_

\$2,200,000

\_\_\_\_\_

5. ANTONIO ESTRADA

\_\_\_\_\_

\$375,000

\_\_\_\_\_

6. LEOPOLD CAUDILLO

\_\_\_\_\_

\$20,000

\_\_\_\_\_